

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Imhotep Muhammad

(Enter above the full name of  
plaintiff in this action)

v.

John Doe

(Enter above the full name of  
the defendant(s) in this action)

CIVIL CASE NO:

1:24cv2228

(to be supplied by Clerk  
of the District Court)

Judge Arbuckle

**FILED**  
HARRISBURG, PA

DEC 23 2024

PER

[Signature]  
DEPUTY CLERK

COMPLAINT

1. The plaintiff Imhotep Muhammad a citizen of

the County of Dauphin State of

Pennsylvania, residing at 2140 N 7th St Harrisburg, PA 17110

wishes to file a complaint under 4th and 14th amendment violation

(give Title No. etc.)  
for negligence, conversion, Emotion Distress, Fraud & misrepresentation

2. The defendant is John Doe, doing business as a employer at Don  
towing

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper exhibits that give further information of your case, attach them to this completed form. Use as much space as you need. Attach extra sheet(s) if necessary) Count 1 - Violation

3. (CONTINUED) of 42 U.S.C. § 1983 (Fourth and Fourteenth Amendments.

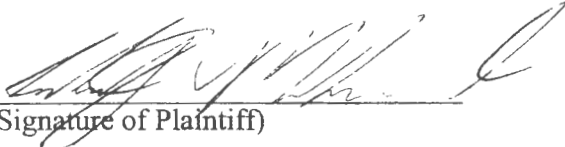
Count 2; Negligence, Count 3; Conversion, Count 4; intentional infliction of emotional distress, Count 5; Fraud and representation,

please see Attachment

4. WHEREFORE, plaintiff prays that he is rewarded with Compensatory

Damages \$1 50,000, Punitive damages, ~~injunctive Relief~~, \$ 250,000, injunctive Relief \$1 25,000, A declaration that the towing was unlawful.

please see attachment

  
(Signature of Plaintiff)

Imhotep Muhammad  
(Printed Name of Plaintiff)

2140 7th st Harrisburg, PA

(Address of Plaintiff)

717-562-6375  
(Phone Number of Plaintiff)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

Imhotep Muhammad,  
Plaintiff,

v.

John Doe, doing business as Don Towing,  
2001 Herr Street, Harrisburg, PA 17103,  
Defendant.

**FILED**  
HARRISBURG, PA

DEC 23 2024

PER CC  
DEPUTY CLERK

CIVIL ACTION NO.:  
JURY TRIAL DEMANDED

1:24cv2228  
Judge Arbuckle

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COMPLAINT

**I. INTRODUCTION**

1. This is a federal civil action brought by Plaintiff, Imhotep Muhammad, against Defendant, John Doe, doing business as Don Towing, for the unlawful towing of Plaintiff's vehicle in violation of his constitutional and statutory rights under the Fourth and Fourteenth Amendments to the United States Constitution and applicable state laws.

2. Plaintiff seeks compensatory damages, punitive damages, injunctive relief, and other relief as this Court deems just and proper.

## **II. JURISDICTION AND VENUE**

3. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343 as this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in Harrisburg, Pennsylvania, within the jurisdiction of this Court.

## **III. PARTIES**

5. Plaintiff: Imhotep Muhammad is a resident of Pennsylvania and at all relevant times was the lawful owner of the vehicle unlawfully towed by Defendant.

6. Defendant: John Doe, doing business as Don Towing, is a business located at 2001 Herr Street, Harrisburg, PA 17103, and is engaged in providing towing services within Pennsylvania.

## **IV. FACTUAL ALLEGATIONS**

7. On May 13, 2021, Plaintiff was unlawfully arrested by Pennsylvania State Troopers without probable cause in violation of his constitutional rights.

8. Following Plaintiff's unlawful arrest, Defendant Don Towing, acting at the request of Pennsylvania State Troopers, towed Plaintiff's vehicle without justification or legal authority.

9. On May 17, 2021, Plaintiff attempted to retrieve his vehicle from Defendant.

10. Defendant, in coordination with Pennsylvania State Troopers, intentionally misled Plaintiff by providing false information about the vehicle's location, causing Plaintiff to endure undue stress and delay for several hours.

11. Plaintiff argues that the towing of his vehicle was unlawful as it directly stemmed from his unlawful arrest, and Defendant's actions amounted to a violation of his rights under state and federal law.

## **V. CLAIMS FOR RELIEF**

### **COUNT I – VIOLATION OF 42 U.S.C. § 1983 (FOURTH AND FOURTEENTH AMENDMENTS)**

12. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

13. Defendant's actions in towing Plaintiff's vehicle without lawful justification violated Plaintiff's Fourth Amendment right to be free from unreasonable seizures.

14. Defendant's intentional provision of false information regarding the vehicle's location deprived Plaintiff of his Fourteenth Amendment right to due process.

### **COUNT II – NEGLIGENCE**

15. Defendant owed Plaintiff a duty of care to properly safeguard and accurately inform Plaintiff about his vehicle's location.

16. Defendant breached this duty by towing the vehicle unlawfully and misleading Plaintiff, causing unnecessary stress, time, and financial losses.

### **COUNT III – CONVERSION**

17. Defendant wrongfully took possession of Plaintiff's vehicle, depriving him of his rightful ownership and use of the vehicle without lawful justification.

### **COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

18. Defendant's deliberate misinformation caused Plaintiff to experience emotional distress, including frustration, anxiety, and humiliation.

### **COUNT V – FRAUD AND MISREPRESENTATION**

19. Defendant knowingly provided false information to Plaintiff with the intent to mislead and cause harm.

### **VI. DAMAGES AND RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

Compensatory Damages:

a. \$50,000 for financial losses, emotional distress, anxiety, and inconvenience caused by Defendant's actions.

Punitive Damages:

b. \$250,000 to punish Defendant for its willful and reckless conduct and to deter similar conduct in the future.

Injunctive Relief:

c. \$25,000 in equitable damages to address ongoing harm and enjoin Defendant from unlawfully towing vehicles or misleading customers in the future.

Other Relief:

- d. A declaration that the towing of Plaintiff's vehicle was unlawful.
- e. Costs of this action, including reasonable attorney's fees pursuant to 42 U.S.C. § 1988.
- f. Any additional relief this Court deems just and proper.

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**VII. DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.

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Respectfully submitted,  
Imhotep Muhammad  
Pro Se Plaintiff



[2140 N 7<sup>th</sup> st Harrisburg, Pa 17110]  
[Imhotep756@gmail.com]

Dated: 12/23/24